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June 30, 2008

### BY FACSIMILE

Honorable Barbara S. Jones  
Daniel Patrick Moynihan Building  
United States Courthouse  
500 Pearl Street, Room 620  
New York, New York 10007

Re: **United States of America v. Saunders, et al.**  
(07 Cr. 3 (BSJ))

Dear Judge Jones:

We represent defendant Tyrone Moore in the above-captioned matter. We write on behalf of Mr. Moore to respectfully request a 30-day extension of Mr. Moore's deadline to file motions, which is currently set for July 7, 2008. We are in discussions to resolve the matter with the United States Attorney's Office and we hope to reach a final agreement shortly.

While we understand that such discussions could continue with motions on file, we believe there are several reasons why extending the motion deadline would be appropriate. First, we currently believe that this matter will be resolved with respect to Tyrone Moore, and that we can reach agreement with the Government within the 30-day time frame being requested. Second, given that fact, that extending the motion deadline would both avoid consuming the Court's valuable time considering motions that would likely become moot, or CJA funds in preparing such motions (our firm was appointed as Mr. Moore's counsel pursuant to the Criminal Justice Act and, as such, we are being compensated out of public funds).

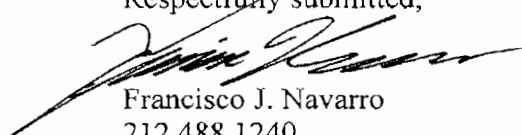
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Hon. Barbara S. Jones  
June 30, 2008  
Page 2

Accordingly, Mr. Moore respectfully requests that he be permitted to file his motions on August 7, 2008, and that the Government's response, which is currently due on August 8, 2008, be due on September 8, 2008. Mr. Moore's also requests that he be permitted to file a reply brief, which is currently due on August 22, 2008, by September 22, 2008. This is Mr. Moore's second request for an extension of these deadlines. Mr. Moore's first request for an extension was granted on June 12, 2008.

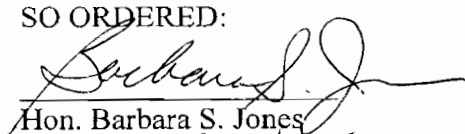
We have consulted with Assistant United States Attorney David Harbach, and he has informed us that the Government has no objection to this request. Thank you for your consideration of this matter.

Respectfully submitted,

  
Francisco J. Navarro  
212.488.1240

Michael S. Kim  
212.488.1201

SO ORDERED:

  
Hon. Barbara S. Jones  
6/30/08

cc: David Harbach, Assistant United States Attorney